

Exhibit D

From: [Cates, Alexandria](#)
To: [Amy K. Alexander](#)
Cc: [Mathew Harrington](#); [Sarah Armon](#); [Todaro, Anthony](#); [Laura Smith](#); [Darren Feider](#); [Mobley, Todd](#); [McFadden, Robert](#); [Bittle, Jacey](#); [Beth Touschner](#); [Katie Marchenko](#); [epruzinsky@sbj.law](#); [Igbokwe, Danielle](#); [Daniel M. Weiskopf](#); [TDo@mcnaul.com](#); [Anna Armitage](#)
Subject: RE: Teixeira v. Mozilla Corporation, et al.
Date: Monday, April 28, 2025 12:07:01 PM

Hi Amy,

Please see our responses in red.

Thanks,

Alex

Alex Cates

Associate

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From: Amy K. Alexander <Amy.Alexander@stokeslaw.com>
Sent: Tuesday, April 22, 2025 2:18 PM
To: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Igbokwe, Danielle <danielle.igbokwe@us.dlapiper.com>
Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Mobley, Todd <todd.mobley@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; Beth Touschner <btouschner@sbj.law>; Katie Marchenko <kmarchenko@sbj.law>; epuzinsky@sbj.law; Daniel M. Weiskopf <dweiskopf@mcnaul.com>; TDo@mcnaul.com; Anna Armitage <Anna.Armitage@stokeslaw.com>
Subject: RE: Teixeira v. Mozilla Corporation, et al.

 EXTERNAL MESSAGE

Hello Alex, Anthony, and Danielle,

Thank you for meeting and conferring yesterday. We're following to summarize the agreements we came to and action items. You agreed to re-evaluated Defendants' position on a number of items should the Court rule favorably to Plaintiff on our pending motion to compel. When we get an order from the Court, we will ask Defendants to confirm within 24 hours whether they are standing on their

objections so we have sufficient time to seek relief if necessary, however we may proceed with a motion prior to getting an order given the case schedule:

- **ROG 8-10; 12; RFP 11, 17, and 21** all involve reasonable and valid requested comparator information. Plaintiff agreed to limit **Rog 12 and RFP 21** to disability discrimination complaints for five years (and note there is a scrivener's error in ROG 12 – it should reference ROG 11, not 10). We request that Mozilla Corporation respond by **Thursday, April 24** regarding these compromises, to allow time to move for relief prior to the May 5 discovery motion cutoff if needed. **Mozilla will not agree to supplement ROG 12 and RFP 21.** Mozilla Corporation did not agree to supplement any other comparator requests, but did agree to re-evaluate its position if the Court rules in favor of Plaintiff on his pending motion to compel comparator information involving substantially similar issues. **In addition, will Mozilla Corporation agree to provide responsive information to ROG 8-10 if limited to members of the Steering Committee only for the last five years? Please provide a response by April 24. We will not agree to this at this time. Depending on the Court's ruling re currently pending motion, we may reconsider.**
- For **RFP 10**, we clarified that we are seeking recordings and minutes of Steering Committee meetings, not personal notes of such meetings. Mozilla Corporation agreed to provide recordings and minutes of Steering Committee meetings from June 1, 2023 through the present.
- We agreed to limit **RFP 14** to company-wide meetings that refer to Plaintiff or the CPO role during the requested time period. Mozilla Corporation agreed to produce recordings and minutes of company-wide meetings that refer to Plaintiff from May 1, 2023 to the present. Please note, notes or recordings of the Fortnightly90 meeting on November 1, 2023 is also responsive to this request and we will expect to receive those with Mozilla Corporation's production.
- **RFP 22** requests documents related to Plaintiff's termination, and Mozilla Corporation refused to provide any documents on the basis of privilege because "lawyers were involved" following the initiation of Plaintiff's suit. We explained that Mozilla Corporation has also requested documents after the initiation of Plaintiff's suit, and we have provided those, and the involvement of lawyers as to a topic does not render all communications related to that topic privileged. Mozilla Corporation agreed to produce non-privileged documents responsive to **RFP 22.**
- **RFP 26 and 27; RFP 2 to Individual Defendants:** Mozilla Corporation, Ms. Chambers, and Ms. Chehak continue to withhold TK Law documents on the basis of attorney-client privilege, but will re-evaluate if the Court orders production of the TK Law report in response to Plaintiff's pending motion to compel.
- In **RFP 29**, Plaintiff requests documents describing restructuring of leadership at Mozilla. Mozilla Corporation stood on its objection but agreed to re-evaluate its position if the Court rules favorably to Plaintiff with respect to RFP 2 in Plaintiff's pending motion to compel.
- **Rog 2** to Chambers and Chehak: You agreed to supplement responses to Rog 2 for Ms. Chambers and Ms. Chehak to provide user information about identified accounts.
- We requested that Defendants clarify what documents it is withholding on the basis of any objections. You agreed to follow up by April 25. **Mozilla confirms that, aside from privileged**

documents that will be identified in a forthcoming privilege log once our production is complete, Mozilla is not withholding any documents.

- Mozilla Corporation agreed to supplement its responses to **ROGs 13, 16, 17, and 18** (ROG 18's supplementation limited as to Ms. Chehak).

Sincerely,

Amy K. Alexander

Attorney | Shareholder

Stokes Lawrence, P.S.

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From: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>

Sent: Wednesday, April 16, 2025 8:52 PM

To: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Amy K. Alexander <Amy.Alexander@stokeslaw.com>

Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Mobley, Todd <todd.mobley@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; Beth Touschner <btouschner@sbj.law>; Katie Marchenko <kmarchenko@sbj.law>; epruzinsky@sbj.law; Daniel M. Weiskopf <dweiskopf@mcnaul.com>; TDo@mcnaul.com; Igbokwe, Danielle <danielle.igbokwe@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>

Subject: RE: Teixeira v. Mozilla Corporation, et al.

Good Evening,

Please see the attached response letter.

Thanks,

Alex

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From: Cates, Alexandria

Sent: Wednesday, April 16, 2025 11:14 AM

To: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Mobley, Todd <todd.mobley@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>

Cc: Amy K. Alexander <Amy.Alexander@stokeslaw.com>; Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Beth Touschner <btouschner@sbj.law>; Katie Marchenko <kmarchenko@sbj.law>; epruzinsky@sbj.law; Daniel M. Weiskopf <dweiskopf@mcnaul.com>; TDo@mcnaul.com

Subject: RE: Teixeira v. Mozilla Corporation, et al.

Hi Maricarmen,

You will be receiving our response by the end of the day.

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From: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>

Sent: Wednesday, April 16, 2025 11:13 AM

To: Anna Armitage <Anna.Armitage@stokeslaw.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Mobley, Todd <todd.mobley@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>

Cc: Amy K. Alexander <Amy.Alexander@stokeslaw.com>; Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Beth Touschner <btouschner@sbj.law>; Katie Marchenko <kmarchenko@sbj.law>; epruzinsky@sbj.law; Daniel M. Weiskopf <dweiskopf@mcnaul.com>; TDo@mcnaul.com

Subject: RE: Teixeira v. Mozilla Corporation, et al.

 EXTERNAL MESSAGE

Alex and Anthony,

We have not received any response to our letter dated April 11, 2025 describing Mozilla Corporation's and Individual Defendants' deficient discovery responses, and asking for availability to meet and confer about these deficiencies. The lack of timely response leaves us to conclude you have not reached out to request a meet and confer because defendants agree to supplement the required information by the end of this week, as outlined in the letter.

If that is not the case, please advise of your availability for an meet and confer tomorrow (4/17), Friday (4/18), or Monday (4/21) at the latest. Please advise of your availability **by close of business today**. Given impending depositions and the discovery cutoff, it is essential that defendants not cause further delay.

Maricarmen Perez-Vargas

Attorney

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From: Anna Armitage <Anna.Armitage@stokeslaw.com>

Sent: Friday, April 11, 2025 2:51 PM

To: Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>; Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Mobley, Todd <todd.mobley@us.dlapiper.com>; robert.mcfadden@us.dlapiper.com; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>

Cc: Amy K. Alexander <Amy.Alexander@stokeslaw.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Darren Feider <dfeider@sbj.law>; Beth Touschner <btouschner@sbj.law>; Katie Marchenko <kmarchenko@sbj.law>; epruzinsky@sbj.law; Daniel M. Weiskopf <dweiskopf@mcnaul.com>; TDo@mcnaul.com

Subject: Teixeira v. Mozilla Corporation, et al.

Good afternoon,

Please see the attached correspondence from attorney Maricarmen Perez-Vargas.

Thank you,

Anna Armitage

Practice Assistant

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